

# EXHIBIT B

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

<p><u>In re Terrorist Attacks on September 11, 2001</u></p> <p><u>XXX</u></p> <p><u>XXX</u></p> <p style="text-align: center;"><b><u>PLAINTIFFS,</u></b></p> <p>V.</p> <p>KINGDOM OF SAUDI ARABIA; SAUDI HIGH COMMISSION FOR RELIEF OF BOSNIA &amp; HERZEGOVINA</p> <p style="text-align: center;"><b><u>DEFENDANTS</u></b></p>	<p><u>As relates to: 03 MDL 1570 (GBD)(SN)</u></p> <p><u>Civil Docket Number:</u> _____</p> <p><b><u>SHORT FORM COMPLAINT AND DEMAND FOR TRIAL BY JURY</u></b></p> <p><b><u>ECF CASE</u></b></p>
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**SHORT FORM COMPLAINT AND DEMAND FOR TRIAL BY JURY**

Plaintiff(s) file(s) this *Short Form Complaint and Demand for Trial by Jury* against Defendants named herein by and through the undersigned counsel. Plaintiff(s) incorporate(s) by reference the specific allegations, as indicated below, of Plaintiffs' *Consolidated Amended Complaint* as to the Kingdom of Saudi Arabia ("Kingdom" or "Saudi Arabia") and the Saudi High Commission for Relief of Bosnia & Herzegovina ("the SHC") and *Demand for Jury Trial* in *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570* in the United States District Court for the Southern District of New York (hereinafter "the CAC"). Plaintiff(s) file(s) this *Short Form Complaint and Demand for Jury Trial* as permitted and approved by the Court's Order of April \_\_\_, 2017, ECF No.\_\_\_\_.

(*Notice to Conform, Applicable For Previously Filed Complaints Only*): Plaintiff(s) in the previously filed case styled as \_\_\_\_\_

\_\_\_\_\_ file(s) this *Short Form Complaint* to incorporate Plaintiffs' *Consolidated Amended Complaint* as to the Kingdom of Saudi Arabia ("Kingdom" or "Saudi Arabia")

and the Saudi High Commission for Relief of Bosnia & Herzegovina (“the SHC”), and *Demand for Jury Trial* (“the CAC”), ECF No.\_\_\_\_\_, as permitted and approved by the Court’s Order of April \_\_\_, 2017, ECF No. \_\_\_\_\_. Upon filing of this *Short Form Complaint*, plaintiffs’ underlying Complaint, ECF No. \_\_\_\_\_, is deemed amended to include the factual allegations, jurisdictional allegations, and jury trial demand of the CAC, as well as all causes of action specified below. The amendment affected through this *Short Form Complaint* supplements by incorporation into, but does not displace, plaintiffs’ underlying Complaint. This *Notice to Conform* relates solely to Saudi Arabia and the SHC, and does not apply to any other defendant, as to which plaintiffs’ underlying Complaint and any amendments thereto are controlling.

#### VENUE

1. Venue in this district is proper pursuant to 28 U.S.C. §§ 1391(b)(2) and 1391(f)(1), as a substantial part of the events giving rise to the claims asserted herein occurred in this district. Venue is also proper in this district pursuant to 18 U.S.C. § 2334(a).

#### JURISDICTION

2. Jurisdiction, is as asserted in the CAC, and further, jurisdiction of the within *Short Form Complaint* is premised upon and applicable to all defendants in this action:

- 28 U.S. C. § 1605(a)(5) (non-commercial tort exception)
- 28 U.S. C. § 1605B (Justice against Sponsors of Terrorism Act)
- Other: (set forth below the basis of any additional ground for jurisdiction and plead such in sufficient detail as per the FRCP): \_\_\_\_\_  
\_\_\_\_\_

#### CAUSES OF ACTION

3. Plaintiff(s) hereby adopt(s) and incorporate(s) by reference, the CAC as if set forth fully herein.

4. Furthermore, the following claims and allegations are asserted by Plaintiff(s) and are herein adopted by reference from the CAC:

- Aiding and Abetting and Conspiring with al Qaeda to Commit the September 11<sup>th</sup> Attacks Upon the United States in Violation of 18 U.S.C. § 2333(d) (JASTA)
- Aiding and Abetting and Conspiring with al Qaeda to Commit the September 11<sup>th</sup> Attacks Upon the United States in Violation of 18 U.S.C. § 2333(a)
- Committing Acts of International Terrorism in Violation of 18 U.S.C. § 2333
- Wrongful Death, as applicable to a claim for such
- Survival
- Alien Tort Claims Act
- Assault and Battery
- Conspiracy
- Aiding and Abetting
- Intentional Infliction of Emotional Distress
- Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Supervising Employees and Agents
- Liability Pursuant to Restatement (Second) of Torts § 317 and Restatement (Third) of Agency § 7.05: Hiring, Selecting, and Retaining Employees and Agents
- 18 U.S.C. § 1962(a)-(d) – CIVIL RICO
- Trespass
- Punitive Damages
- Plaintiff assert(s) the following additional theories and/or Causes of Action against the Defendants: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_.

#### **IDENTIFICATION OF PLAINTIFFS**

5. The following allegations and information contained herein, is alleged as to each individual who is bringing this claim, as indicated on Appendix 1 to this *Short Form Complaint*, and/or as to each decedent who was injured and who is now deceased, whose claim is brought by the Estate representative, and as to the survivors of the Estate, herein referred to as "Plaintiffs."

- a. The citizenship/nationality of said Plaintiff is indicated at Appendix 1 to this Short Form complaint.
- b. Said Plaintiff is entitled to recover damages on the causes of action set forth in this Complaint.
- c. As indicated at Appendix 1, said Plaintiff was injured as a result of the terrorist attacks of September 11, 2001; is the estate representative of someone who was injured as a result of the terrorist attacks of September 11, 2001 and who is now deceased, or is a survivor of someone who was injured as a result of the terrorist attacks of September 11, 2001 and who is now deceased.
- d. For those plaintiffs with injury claims, as indicated in Appendix 1, on or after September 11, 2001, said Plaintiff was present at the Pentagon and/or the World Trade Center site and/or its surroundings and/or lower Manhattan and/or at an area wherein he/she was exposed to toxins as a result of the terrorist attacks and was exposed to toxins from the attacks, and/or was otherwise injured, and/or as otherwise alleged:  

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- e. As a direct, proximate and foreseeable result of Defendants' actions or inactions, Plaintiff suffered bodily injury and/or death, and consequently economic and other losses, including but not limited to pain and suffering, emotional distress, psychological injuries, and loss of enjoyment of life, and as otherwise described in the

CAC, and/or as otherwise may be specified in subsequent discovery proceedings, and/or as otherwise alleged herein: \_\_\_\_\_.

f. The name, relationship to the injured 9/11 victim, residency, citizenship/nationality, and the general nature of the claim for each plaintiff is listed on the attached Exhibit 1, and is incorporated herein as allegations, with all allegations of the within *Short Form Complaint* deemed alleged as to each plaintiff.

**IDENTIFICATION OF THE DEFENDANTS**

6. The following entities are Defendants herein:

- Kingdom of Saudi Arabia
- Saudi High Commission for Relief of Bosnia & Herzegovina

Plaintiffs' constituent case, if applicable, and this *Short Form Complaint* shall be deemed subject to any motion to dismiss the CAC or Answer to the CAC filed by Saudi Arabia or the SHC. By way of filing this *Short Form Complaint*, plaintiffs shall not be deemed to have adopted any class-action allegations set forth in the CAC or waived any right to object to class certification or opt out of any certified class. This *Short Form Complaint* also does not serve as a request for exclusion from any class that the Court may certify.

**WHEREFORE**, Plaintiff(s) pray(s) for relief and judgment against Defendants as set forth in the CAC as appropriate.

**JURY DEMAND**

Plaintiff(s) hereby demand(s) a trial by jury as to the claims in this action.

Dated: \_\_\_\_\_

Respectfully Submitted,

Counsel for Plaintiff(s)

See Exhibit 1 Annexed

**APPENDIX 1 TO THE *SHORT FORM COMPLAINT***  
**(EXEMPLAR-ALL NAMES BELOW ARE FICTITIOUS)**

Each line below is deemed an allegation, incorporating the allegations, language and references within the *Short Form Complaint* to which this Appendix is appended, and shall be referenced as Allegation 1 of Appendix 1 to the *Short Form Complaint*, Allegation 2 of Appendix 1 to the *Short Form Complaint*, etc.)

	Plaintiffs Name (alphabetically ordered by last name of Injured 9/11 Victim)	Relationship to Injured 9/11 Victim	State of Residency at filing	Citizenship/ Nationality on 9/11/01	General Nature of Claim Asserted (e.g., personal injury, wrongful death, solatium)
1.	Mary Ames	Self	NY	US	PI
2.	William Green	Self	CA	US	PI
3.	Frank Boyles, as administrator of the Estate of Mary Kiles, deceased, and individually	PR/Spouse	PA	US, US	WD, Solatium
4.	Jane Kiles	Parent	PA	US	Solatium
5.	John Kiles	Parent	PA	US	Solatium
6.	Sally Kiles	Sibling	NJ	US	Solatium
7.	Sylvia Smith	Self	NJ	US	PI
8.					
9.					
10.					